

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE BIOPURE CORPORATION
SECURITIES LITIGATION**

)
) **Civil Action No. 03-CV-12628-NG**
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)

**OPPOSITION OF DEFENDANT RONALD F. RICHARDS' TO
PLAINTIFFS' MOTION TO AMEND THE COMPLAINT**

Defendant Ronald F. Richards submits the following opposition to the plaintiffs' motion to amend the complaint simply to highlight that the proposed amended complaint makes no new or additional allegations against Richards. Richards therefore submits that the amended complaint is futile for the same reasons set forth in the pending motion to dismiss.

For all of the foregoing reasons, Plaintiffs' Motion to Amend should be denied, and the complaint dismissed in its entirety, with prejudice.

Dated: January 23, 2006

Respectfully submitted,

/s/ Christopher Robertson
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 23, 2006.

/s/ Christopher Robertson